

EXHIBIT 8

**REDACTED VERSION OF
DOCUMENT SOUGHT TO BE
SEALED**

From: Andrea P Roberts <andreaproberts@quinnemanuel.com>
Sent: Wednesday, August 09, 2017 9:39 PM
To: Maxwell Pritt
Cc: Andrea P Roberts
Subject: RE: Activity in Case 3:17-cv-00939-WHA Waymo LLC v. Uber Technologies, Inc. et al Order on Discovery Letter Brief

Follow Up Flag: Follow up
Flag Status: Flagged

Max,

We will run the searches on the custodians that Judge Corley ordered us to search. Judge Corley specifically ordered us to run the terms on the 11 identified custodians' emails and that is what we will do. We do not think it is appropriate for Uber to demand more than what the Court ordered or to change the custodians the Court ordered. Specifically, swapping [REDACTED] for [REDACTED] is not workable because Uber did not request that we search Ms. [REDACTED] emails until very late in the negotiations. Accordingly, her emails are not all collected and were not readily available for testing. Given where we are in the schedule, were we to complete collection of Ms. [REDACTED] emails it would still take a few days before they would even be ready for searching and then review and production. As for [REDACTED], again Judge Corley did not order that he be included as a custodian. That he was designated as a 30(b)(6) on Uber's bonus-related 30(b)(6) topic does not justify adding him as a custodian. Uber could have served its 30(b)(6) notice much earlier and did not.

Thanks,
Andrea

From: Maxwell Pritt [mailto:mpritt@BSFLLP.com]
Sent: Tuesday, August 08, 2017 7:22 AM
To: Andrea P Roberts <andreaproberts@quinnemanuel.com>
Subject: FW: Activity in Case 3:17-cv-00939-WHA Waymo LLC v. Uber Technologies, Inc. et al Order on Discovery Letter Brief

Hi Andrea,

Regarding the custodians for the bonus-related searches, please confirm you will replace [REDACTED] with [REDACTED] which was our last proposal as of the motion to compel. Also, we had proposed running the bonus-related searches against 13 custodians, not 11, by adding [REDACTED] and [REDACTED] (Mot. at 4 n.6.) It looks like Judge Corley missed that footnote. In any event we're willing to drop Mr. [REDACTED] if you would add Mr. [REDACTED] in light of his designation on the bonus 30(b)(6) topic. If you're not willing to do so, please let me know and we can add it to a meet and confer discussion. Thank you!

Best,
Max

From: ECF-CAND@cand.uscourts.gov [mailto:ECF-CAND@cand.uscourts.gov]
Sent: Monday, August 07, 2017 10:06 AM
To: efiling@cand.uscourts.gov

Subject: Activity in Case 3:17-cv-00939-WHA Waymo LLC v. Uber Technologies, Inc. et al Order on Discovery Letter Brief

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U.S. District Court

California Northern District

Notice of Electronic Filing

The following transaction was entered on 8/7/2017 at 10:06 AM and filed on 8/7/2017

Case Name: Waymo LLC v. Uber Technologies, Inc. et al

Case Number: [3:17-cv-00939-WHA](#)

Filer:

Document Number: [1094](#)

Docket Text:

ORDER RE: UBER'S MOTION TO COMPEL WAYMO TO UTILIZE CERTAIN SEARCH TERMS. Signed by Magistrate Judge Jacqueline Scott Corley on 8/7/2017.(ahm, COURT STAFF) (Filed on 8/7/2017)

3:17-cv-00939-WHA Notice has been electronically mailed to:

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3:17-cv-00939-WHA Please see [Local Rule 5-5](#); Notice has NOT been electronically mailed to:

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